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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re RETROPHIN, INC. Securities  
Litigation

No.: 1:14-cv-08376-PKC

CLASS ACTION

THIS DOCUMENT RELATES  
TO:

STIPULATION AND [~~PROPOSED~~] ORDER  
REGARDING PRE-MOTION LETTER

On February 10, 2015, the Court issued an order consolidating the related actions, appointing Lead Plaintiff, and approving undersigned counsel as Lead Counsel. (Dkt. No. 11.) On February 18, 2015, the Court granted Lead Plaintiff's request for an extension to file a First Amended Consolidated Complaint. On March 3, 2015, Lead Plaintiff filed a First Amended Consolidated Complaint ("FACC") against, among others, Retrophin, Inc., Marc L. Panoff, Jeffrey Payley ("Defendants").<sup>1</sup>

Defendants will likely move to dismiss the FACC. Under Rule 2.A of the Court's Individual Practices, and consistent with Motion Procedure A.4(b) of the Pilot Project Case Management Techniques for Complex Civil Cases in the Southern District of New York (Dkt. No. 3 at 17), a pre-motion letter setting forth the legal and factual basis of any anticipated motion is required.

<sup>1</sup> The FACC also names Martin Shkreli, Steve Richardson, Stephen Aselage, and Cornelius E. Golding as defendants, but these individuals have not yet been served or waived service of process in this action.

THEREFORE, by and through their undersigned counsel, Lead Plaintiff Grachya Kazanchyan ("Lead Plaintiff") and Defendants hereby stipulate as follows and jointly request that the Court enter the below Order approving this Stipulation:

1. On or before March 31, 2015, Defendants shall file any pre-motion letter(s) setting forth the legal and factual basis of the motion(s) to dismiss and a proposed briefing schedule. The letter(s) shall comply with Rule 2.A of the Court's Individual Practices.

2. Lead Plaintiff shall have until April 7, 2015 to respond to any pre-motion letter(s). Lead Plaintiff's response(s) shall comply with Rule 2.A of the Court's Individual Practices.

3. The Initial Pretrial Conference, which is currently scheduled for March 11, 2015 at 10:30 a.m., is adjourned until ~~after the Court decides Defendants' anticipated motion(s) to dismiss or such other time as the Court deems proper.~~

at 11:30 a.m.

April 23, 2015

Dated: March 4, 2015

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*Attorneys for Defendant RETROPHIN, INC.*

Dated: March 4, 2015

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*Attorneys for Defendant MARC L. PANOFF*

Dated: March 4, 2015

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*Attorneys for Defendant JEFFREY PALEY*

Dated: March 4, 2015

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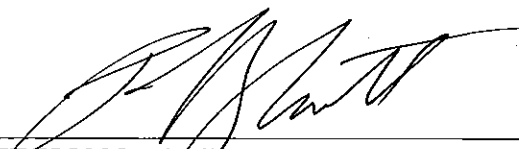
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*Attorneys for Lead Plaintiff GRACHYA  
KAZACHYAN*

IT IS SO ORDERED.

Dated:

3-5-15

  
THE HONORABLE P. KEVIN CASTEL  
UNITED STATES DISTRICT JUDGE

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